

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with)	CC Docket No. 94-102
Enhanced 911 Emergency)	
Calling Systems)	RM-8143
)	
Non-Initialized Phones)	
)	

**COMMENTS OF INTRADO INC.
IN SUPPORT OF THE PETITION FOR RECONSIDERATION**

Pursuant to the Public Notice released July 3, 2002, Intrado Inc. (Intrado)¹ hereby submits these comments in support of the Petition for Reconsideration² filed by The Alliance for Telecommunications Industry Solutions (ATIS) in the above captioned proceeding. ATIS seeks reconsideration of the Commission's *Report and Order* adopting sections 20.18(l)(1)(I) and (l)(2)(I) of the Commission's rules.³ ATIS has introduced new evidence into the record not previously considered by this Commission. ATIS' compelling arguments and the identification of an alternative solution satisfy the rules for the Commission's reconsideration. No party will be prejudiced from the Commission's reconsideration based on this new evidence. Moreover, new

¹ Founded in 1979, Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

² Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Non-initialized Phones, CC Docket No. 94-102, ESIF Petition for Reconsideration, filed June 12, 2002.

³ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Non-initialized Phones, CC Docket No. 94-102, RM-8143, Report and Order, FCC 02-120 (rel. April 29, 2002 (*Order*); 67 Fed. Reg. 36112 (2002) (to be codified at 47 C.F.R. §§ 20.18 (l)(1)(i), (l)(2)(i)).

evidence submitted by ATIS makes it impossible for the Commission to conclude that there will be substantial public safety benefits from the use of the sequential number code 123-456-7890 as ordered, especially when compared to the benefits that would accrue from the use of a compliant technology such as Annex C of J-STD-036. Accordingly, ATIS' petition for reconsideration should be granted.

DISCUSSION

Intrado fully supports the work of the Emergency Services Interconnection Forum (ESIF), an ATIS committee on standards, that has developed an alternative solution to address the lack of call-back capabilities in non-initialized service handsets. This solution, Annex C of the J-STD-36, "Enhanced Wireless 9-1-1 Phase 2," was published in August 2000 as a joint standard by the Telecommunications Industry Association (TIA), on behalf of Committee TR-45, and ATIS, on behalf of its sponsored Committee T1.

Annex C contains a comprehensive solution for situations when a mobile station does not have a valid call-back number. It specifically addresses calls made from non-initialized telephone sets, mobile phones whose subscriptions have expired, mobile phones without a subscriber identity module inserted, mobile phones from certain other countries, and mobile phones from a service provider that does not have a roaming agreement with the current serving service provider. Annex C uses the last seven digits of a handset's Electronic Serial Number (ESN) or International Mobile Station Equipment Identity (IMEI) prefaced with the digits 911 to create a surrogate ten-digit number. This surrogate number is then delivered to the Public Safety Answering Point (PSAP) when a 911 call is placed from a phone with no call-back capability.

The Annex C solution is superior to the Commission's ruling regarding the use of the code 123-456-7890 for several reasons. As described above, the Annex C solution is far more

comprehensive and covers handsets not contemplated by the Commission. The Commission's Order applies only to non-service-initialized handsets donated through carrier-sponsored programs or newly manufactured "911-only" phones. The Commission takes note of the numerous donation programs where older, unused, and unsubscribed cellular phones are collected and distributed to needy individuals, but the recent ruling fails to address the thousands of already distributed phones with lapsed subscriptions lying around in drawers, closets, and glove compartments. Annex C can be used for telephones distributed by non-carrier sponsored programs, old sets that have lapsed subscriptions and are passed to family members for use in emergencies, and international roaming sets whose true call back numbers cannot be passed into the current emergency network infrastructure and displayed on the PSAP equipment.

Secondly, the Annex C solution is better for call-taker training, system maintenance, and trouble resolution. As this Commission well knows, Automatic Number Identification (ANI) drives today's 911 systems. Location information delivered to the PSAP is dictated by the initial ANI delivered to the PSAP. Unique attributes accompanying the ANI delivered to the PSAP provide clues to the call-taker on how to handle the call should the caller be unable to speak or provide any location information to the call-taker. Mandating a universal ANI such as 123-456-7890 for all non-serviced-initialized handsets removes those unique attributes and has the potential to make call-taker training and response more onerous and more costly.

The unintended effect of mandating the code 123-456-7890 for all carrier-sponsored non-service-initialized donor handset programs and 911-only sets creates a time consuming burden for the call-taker in certain call handling and system trouble reporting situations. Call-takers are already trained to recognize any call delivered with 911 as either the area code (NPA) or the exchange prefix (NXX) as a pseudo-ANI and the call will require special handling if the caller is

unable to provide details to the PSAP. The Annex C solution builds upon that common knowledge base. The Commission's mandate of the sequential code, while providing a unique pseudo-ANI, does not leverage existing training tools used today for PSAP call-taker training.

Thirdly, the number of abusive and fraudulent calls delivered into 911 systems from non-service-initialized handsets is increasing daily. These abusive calls are very disruptive and tie up 911 lines that interfere with actual emergency calls. It is imperative these abusers be identified and apprehended. The use of the uniformity code 123-456-7890 makes swift identification of such abusers difficult. The Annex C solution provides unique handset information that is eminently more useful in identifying such system abusers.

The monitoring of 911 system integrity is dependent upon unique attributes of the ANI. Many reports generated by hardware elements in the 911 network are driven by the ANI so as to provide relevant gauges of overall system health. For example, "No Record Found" reports from the ALI hosts are combed through to assure database integrity. Numerous calls from 123-456-7890 will serve to make this maintenance task more arduous.

Not only does ATIS introduce a solution not previously contemplated by this Commission, ATIS also identifies a problem with the solution mandated by the Commission's Order. ATIS rightly argues that the number requirement 123-456-7890 is one of a group of numbers that has been recommended to serve as valid International Roaming Mobile Identification Numbers (MIN) (IRM). The numbers 123 have been suggested as an area code for IRM because it enables the wireless network to process international roaming calls utilizing numbers that cannot be used in the standard NANPA, because 123 is not a valid area code. Culling out one number such as 123-456-7890 from the IRM assignment pool has the technological potential to nullify one million numbers.

Lastly, the Commission has repeatedly held that there is currently no technologically feasible method in place today to provide call back numbers to non-initialized handsets. The Commission's most recent *Report and Order* does nothing to address this problem, but rather simply assigns a sequential code to identify that the calls are in fact coming from non-service-initialized handsets. The Commission should not abandon efforts to educate users about the reduced capabilities of PSAPs to provide emergency assistance due to unintended disconnection or the inability of the caller to provide details to the call-taker.

CONCLUSION

Wherefore, for the foregoing reasons, Intrado joins ATIS in asking the Commission to reconsider its decision in this proceeding.

Respectfully Submitted,

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